

NECA's Weekly Federal Regulatory Summary

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October 28, 2019 HIGHLIGHTS

- The FCC adopted six items at its October 25, 2019 [Open Meeting](#), including an [order on reconsideration](#) on CAF testing procedures and performance measures, arising from several petitions for reconsideration and applications for review of the [2018 Performance Measures Order](#), that provides flexibility for smaller carriers by making targeted modifications to the testing procedures carriers must use to show their networks perform at the Commission's speed and latency standards.
- The FCC issued its [15th Broadband Deployment Report Notice of Inquiry](#) to assess the availability of advanced telecommunications capability to all Americans in a reasonable and timely fashion. The FCC seeks comment on maintaining the current speed benchmark of 25/3 for fixed broadband, and if mobile broadband should be treated as a functional substitute for fixed wireline broadband, among other things. Comments are due November 22, 2019; replies are due December 9, 2019.
- The [report and order](#) that adopted reforms to eliminate access arbitrage schemes [is effective](#) November 27, 2019; compliance with the requirements in § 51.914(b) and (e) (additional provisions applicable to access stimulation traffic) is delayed. The Wireline Competition Bureau [denied](#) Great Lakes Communication, et al.'s [petition for stay](#) of the [report and order](#).
- The FCC [seeks comment](#) on the effectiveness of its [2012 tribal engagement further guidance](#), steps the FCC can take to assist parties with their engagement efforts, and refreshing the record on pending petitions for reconsideration on the tribal engagement obligation reporting. Comments are due December 5, 2019; replies are due January 6, 2020.
- NTCA, USTelecom, ITTA, WTA, and TDS Telecom [expressed concerns](#) with statements in the network testing [draft order on reconsideration](#) that stipulate any failure to meet speed and latency requirements will be considered a failure to deploy.
- USTelecom, AT&T, et al. [discussed](#) how edits made to the High Cost Universal Broadband portal would be viewed for purposes of complying with the CAF.
- [Reply comments were filed](#) on the [NPRM](#) proposing to establish a new RDOF that would target support to areas that lack 25/3 Mbps broadband service and distribute \$20.4 billion in high-cost USF support over 10 years using a two-phase reverse auction framework.
- West Carolina Rural Telephone, et al. [expressed](#) support for Pineland's [petition for reconsideration](#) of the December 2018 [report and order](#) on A-CAM II support.
- The USDA [announced](#) it invested \$9,750,000 in high-speed broadband infrastructure that will create or improve rural e-connectivity for 3,911 rural households in Orangeburg County, South Carolina.
- The U.S. Supreme Court [declined](#) to hear the Minnesota PUC's [appeal](#) of an Eighth Circuit Court of Appeals' [decision](#) affirming a District Court of Minnesota's ruling that Charter's VoIP service is an information service and that state regulation of Charter's VoIP services was preempted.

Other Key Upcoming Dates

- Nov. 22 - Comments due on the [15th Broadband Deployment Report NOI](#) to assess the availability of advanced telecommunications capability to all Americans in a reasonable and timely fashion. Replies are due December 9, 2019.

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USF Reform

- The Consumer and Governmental Affairs Bureau issued a [public notice](#) on October 21, 2019, seeking comment on how best to facilitate and improve dialogue and coordination between Tribes and ETCs to ensure successful broadband deployment and adoption on Tribal lands. The Bureau seeks to assess the effectiveness of the FCC's [2012 tribal engagement further guidance](#), steps the FCC can take to assist parties with their engagement efforts, and encouraged parties to refresh the record with respect to the pending petitions for reconsideration that were filed on the tribal engagement obligation reporting. Comments are due December 5, 2019; replies are due January 6, 2020.
- NTCA, USTelecom, ITTA, WTA, and TDS Telecom [spoke with](#) Chairman Pai's rural broadband advisor on October 18, 2019, to express concerns with statements in the network testing [draft order on reconsideration](#) that stipulate any failure to meet speed and latency requirements will be considered a failure to deploy. They said failure to obtain a satisfactory speed/latency measurement result should not be equated with an outright failure to deploy. They asserted that, consistent with the structure originally contemplated by the 2018 Performance Measurements Order, the FCC should modify the draft order to decouple the separate penalty regimes for speed/latency measurements and buildout obligations.
- USTelecom, AT&T, et al. [met with](#) Wireline Competition Bureau and USAC staff on October 16, 2019, to discuss how edits made to the High Cost Universal Broadband portal would be viewed for purposes of complying with the CAF. They expressed concern that if a carrier "deleted" a number of locations for a certain year and then those same locations were re-uploaded in the HUBB with a different deployment year, it could retroactively call into question the carrier's compliance with previous milestone reporting. They said all parties at the meeting understood that if the carrier had previously met a deployment year's milestone, and then, by virtue of "deleting" and resubmitting locations with better geocodes, fell under the milestone for a particular year, there would be no compliance penalty as long as the cumulative number of locations submitted to date for the life of the program remained above the current threshold.
- Reply comments were filed on October 21, 2019, on the [NPRM](#) proposing to establish a new Rural Digital Opportunity Fund that would target support to areas that lack 25/3 Mbps broadband service and distribute \$20.4 billion in high-cost USF support over 10 years using a two-phase reverse auction framework. [NTCA](#) suggested the FCC adopt a longer-term perspective for the RDOF auction that seeks to promote the deployment and sustainability of networks that will satisfy immediate needs for connectivity and will remain useful to rural consumers a decade from now. [WTA](#) reiterated its proposal for grant of a 25 percent RDOF bidding credit to existing CAF Phase II recipients that have met their 10/1 Mbps build-out obligations for the subject state and its proposals for changes to the CAF Phase II Auction weighting factors. WTA also supported the use of census blocks as bidding units in order to encourage greater participation by smaller bidders. [USTelecom](#) asserted comments in this proceeding confirmed that investing in terrestrial broadband will enhance rural connectivity today and offer a gateway to next generation 5G services. It said the FCC should develop a Broadband Serviceable Location Fabric prior to the auction, at least, for the rural areas to be auctioned and eliminate the penalties that come with returning funding if location counts are deemed insufficient. [CenturyLink](#) said the FCC should revisit the proposed auction structure to ensure the auction structure does not disfavor fiber deployment, uses the full auction budget, and prohibits bids that exceed the total RDOF budget. It also said the FCC should not penalize winning bidders by reducing support due to incorrect initial locations counts, and the FCC should use fourth quarter 2018 Form 477 data as the baseline data for determining areas eligible for the RDOF. [GVNW](#) asserted comments show there is support in the record for the Commission to use a more thorough short-form application process to ensure that potential bidders have the technical expertise and ability to provide service. GVNW also said the record supports the continued use of census block groups as the bidding unit for the RDOF auction because it will allow entities of all sizes to participate in the auction. The [California PUC](#) supported the creation of the RDOF, under two conditions: the FCC should not open any RDOF funding rounds until and unless it orders and implements a more accurate process for broadband data and mapping; and the FCC should authorize federal-state cooperation in the RDOF to take advantage of potential efficiencies from combined federal-state funds. [all replies available](#).

- INCOMPAS [met with](#) Chairman Pai and his advisors on October 17, 2019, to express support for the RDOF [NPRM](#). It asserted a reverse auction that will allow numerous entities to compete for funding will promote more efficient distribution of high-cost funding. It also supported the NPRM's proposal to weight bids that can deliver up to 1 Gigabit speeds more favorably in the reverse auction. It said another goal for the RDOF should be to promote the availability of reasonably comparable service for consumers and businesses in rural, insular, and high-cost areas. INCOMPAS also expressed support for the [NPRM](#) on deployment of broadband to multiple tenant environments.
- West Carolina Rural Telephone Cooperative, Pineland Telephone Cooperative, JSI, and Moss Adams [met separately with](#) legal advisors to Commissioners Carr and Rosenworcel on October 21, 2019, to discuss WCTel's support for Pineland's [petition for reconsideration](#) of the December 2018 [report and order](#) on A-CAM II support. They provided new data refining initial estimates on the budget impact and further refinement of how glide path companies would be handled were the petition to be granted, as well as how grant of the petition would benefit rural customers across the country. They said if the petition is granted, thousands of additional locations will be able to receive 25/3 Mbps broadband.
- Reid Consulting Group, broadband consultant for the Buckeye Hills Regional Council, [spoke with](#) Commissioner O'Rielly's chief of staff on October 23, 2019, to review the interim results of the BHRC's broadband study that was funded by the Appalachian Regional Commission. BHRC said the study highlights the persistent digital desert afflicting low population density areas of Appalachian Ohio and explained proposed solutions through modification of the Rural Digital Opportunity Fund. BHRC also presented its own cost study, or mini-CAM, and data regarding the service area to support its proposed modifications to the RDOF.
- The Wireline Competition Bureau, the Wireless Telecommunications Bureau, and the Auctions Division of the Office of Economics and Analytics issued an [order](#) on October 25, 2019, granting a petition filed by Standing Rock Telecommunications for a limited waiver of the construction, drive testing, and reporting deadlines associated with the receipt of its final disbursement of Mobility Fund Phase I support.
- Redwire filed a [petition for waiver](#) on October 22, 2019, of the February 25, 2019 deadline to submit documentation of its ETC designation in the state of Oklahoma, where Redwire is provisionally selected to receive CAF Phase II support to deploy broadband service to 8,041 locations in Oklahoma. Redwire said it sought ETC designation from the FCC on February 15, 2019, but later determined that none of the census blocks where it was declared the auction winner were located on tribal lands and withdrew its ETC application on March 3, 2019. Redwire claimed it recently filed an amended ETC application with the Oklahoma Corporation Commission and that approval is expected in the next few weeks.

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Broadband

- The FCC issued its [15th Broadband Deployment Report Notice of Inquiry](#) on October 23, 2019, initiating the next annual assessment of the availability of advanced telecommunications capability to all Americans in a reasonable and timely fashion. The FCC proposes to maintain the current speed benchmark of 25/3 for fixed broadband, and to conduct an evaluation of fixed and mobile services using the same four categories for evaluation that were presented in the [May 2019 report](#): fixed services; mobile LTE services; fixed terrestrial and mobile LTE services; and fixed terrestrial or mobile LTE services. The FCC also asks, among other things, if mobile broadband should be treated as a functional substitute for fixed wireline broadband. Comments are due November 22, 2019; replies are due December 9, 2019.
- Chairman Pai sent a [letter](#) to Sen. Joe Manchin (D-W. Va.) on October 15, 2019, in response to his [letter](#) on broadband mapping. Pai said the FCC adopted a report and order in August aimed at generating more granular and accurate broadband maps through the creation of the Digital Opportunity Data Collection. Pai said the FCC wants broadband providers to report where they actually offer

service below the census-block level, and to include third-party input to ensure up to-date and accurate broadband deployment maps. He said these updated maps would be used to focus funding to expand broadband through future initiatives, such as the second phase of the proposed Rural Digital Opportunity Fund.

- The USDA [announced](#) on October 22, 2019, it invested \$9,750,000 in high-speed broadband infrastructure that will create or improve rural e-connectivity for 3,911 rural households in Orangeburg County, South Carolina. The funding is through the USDA's [ReConnect Program](#) and will be used to deploy a fiber to the home broadband network capable of simultaneous transmission rates of 100 Mbps or greater. The funded service areas also include 21 farms, 17 rural businesses, 13 educational facilities, nine critical community facilities and a health care center.
- The FCC issued a [public notice](#) on October 23, 2019, announcing that the next meeting of the Broadband Deployment Advisory Committee will be held on December 3, 2019. At this meeting, the BDAC will receive status reports and updates from its three working groups: Disaster Response and Recovery; Increasing Broadband Investment in Low-Income Communities; and Broadband Infrastructure Deployment Job Skills and Training Opportunities. The BDAC meeting is open to the public.
- The FCC issued a [public notice](#) on October 23, 2019, announcing the next meeting of the Technological Advisory Council will be held on December 4, 2019. At this meeting, the TAC will discuss progress on work initiatives from the previous meeting and provide final recommendations from each working group. The meeting is open to the public.
- The Wireless Telecommunications Bureau issued an [erratum](#) on October 23, 2019, to the [order](#) that was issued in response to the U.S. Court of Appeals for the D.C. Circuit's [remand](#) of the FCC's March 2018 [second report and order](#) on small cell deployments. The Bureau added paragraph 5 to the order.
- The League of Oregon Cities, the National League of Cities, et al. [met with](#) advisors to Chairman Pai and Commissioners Rosenworcel and Starks on October 21, 2019, to discuss broadband deployment efforts by Oregon cities. They said several cities in Oregon have built municipal broadband networks that allow local governments to ensure residents are served when there are no affordable alternative commercial services. They asserted Oregon cities need a greater partnership with the federal government to connect local school districts to broadband and said connecting every anchor institution should be a top priority for the FCC. They also expressed their opposition to the proposals included in the petitions by [CTIA](#) and [WIA](#) (petition for [rulemaking](#)), asserting these proposals would negatively impact their communities.

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ICC

- The [report and order](#) that adopted reforms to eliminate access arbitration schemes was [published](#) in the Federal Register on October 28, 2019. The order is effective November 27, 2019; compliance with the requirements in § 51.914(b) and (e) (additional provisions applicable to access stimulation traffic) is delayed, and the FCC will publish a document in the Federal Register announcing the compliance date.
- The Wireline Competition Bureau issued an [order](#) on October 25, 2019, denying Great Lakes Communication, Northern Valley Communications, et al.'s [petition for stay](#) of the [report and order](#) that adopted reforms to eliminate access arbitration schemes pending appeal of Great Lakes, NVC, et al. The Bureau said, among other things, petitioners' arguments they will lose revenue absent a stay do not support a claim of irreparable harm, noting they provided only estimated loss amounts with no provision of actual company financial data, no explanation of how those alleged losses relate to company profits as a whole, and provide no consideration of the potential mitigating effect of other revenue streams.

- AT&T filed its [reply](#) on October 18, 2019, to the [answer](#) of Local Exchange Carriers of Michigan and/or Prime Circuits (LEC- MI), in the case addressing AT&T's [formal complaint](#) that alleged LEC-MI improperly billed AT&T at least \$1,054,897 in end office access charges on aggregated 8YY traffic that AT&T paid.
- No comments were filed on TrioTel Communications [petition](#) seeking a waiver of sections 51.917(b)(1) and 51.917(b)(7) to recalculate for merged study areas the 2011 Interstate Switched Access Revenue Requirement and 2011 RoR Carrier Base Period Revenue necessary to determine CAF-ICC support. Replies are due November 4, 2019. [public notice](#)

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Robocalls

- Chairman Pai sent [letters](#) to Sens. Richard Durbin (D-Ill.) and Tammy Duckworth (D-Ill.) on October 15, 2019, in response to their [letter](#) asking the Commission to address robocalls. Pai discussed actions the Commission has taken, including authorization of a reassigned numbers database and adoption of a proposal to allow phone companies to establish call blocking services as a default setting for consumers.

Universal Service

- Chairman Pai sent [letters](#) to 30 members of Congress on October 15 2019, to respond to their [letter](#) that urged the Commission to discard the proposal to cap the USF fund. Pai said the FCC said sought comment on a proposed overall annual budget of \$11.42 billion, which is more than three billion dollars above current USF program disbursements. Pai said this amount would be adjusted regularly for inflation.
- Sens. Brian Schatz (D-HI), Lisa Murkowski (R-AK), Mazie Hirono (D-HI), and Dan Sullivan (R-AK) sent a [letter](#) to Chairman Pai on October 24, 2019, to express concern with the proposed USF budget cap. They asserted capping USF overall will not generate the data that will help the FCC improve the function of USF programs, and claimed it is actually the first step in creating an artificial budget crisis that will encourage the Commission to favor certain programs over others. They also expressed opposition to combining the rural health care and E-Rate programs' funding under one cap. [press release](#)
- The Wireline Competition Bureau issued [an order](#) on October 22, 2019, denying petitions for waiver filed by the [New York State PSC](#), the [State of Vermont](#), the [Georgia PSC](#), the [Connecticut PURA](#), and the [Nebraska PSC](#), which sought to postpone the scheduled full launch for the National Lifeline Eligibility Verifier in their respective states until the National Verifier has established an automated connection with a state eligibility database. The Bureau said petitioners have not shown good cause to delay implementation of the National Verifier.
- The Connecticut Public Utility Regulatory Authority filed a [petition](#) on October 18, 2019, seeking a temporary waiver of the October 23, 2019, implementation of the National Lifeline Verifier in Connecticut. The PURA asserted it is working with USAC on addressing certain legal and technical issues so that the National Verifier can process applications using an automated eligibility processing system. The PURA requested a nine-month waiver and said the extension would give it and USAC time necessary to enable automated eligibility processing. Connecticut Governor Ned Lamont filed a [letter](#) expressing support for the petition.
- Chairman Pai sent a [letter](#) to Rep Brian Mast (R-Fla.) on October 16, 2019, in response to his [letter](#) on the National Lifeline Verifier. Pai said the FCC has directed USAC to develop an application programming interface that would permit carriers to interface directly with the National Verifier, and said USAC and the FCC will continue to work to increase the automated connections.

- NTCA [met with](#) Chairman Pai's advisor on October 21, 2019, to discuss the need for an approach to minimum service standards that will be driven by consumer choice rather than regulatory mandate. NTCA recommended allowing existing Lifeline subscribers to choose whether to continue to receive Lifeline support for the services they already subscribe to today or to upgrade their subscription to a service that meets the Commission's prescribed minimum service standards where available.
- USTelecom, AT&T, CenturyLink, Consolidated, Verizon and Windstream [met separately](#) with advisors to Commissioners Carr, Rosenworcel and Starks on October 18 and 21, 2019, to discuss the Lifeline [item on circulation](#) and [pending petitions](#) regarding the Lifeline minimum service standards. They reiterated their concerns about requiring individual employees of USTelecom's members to provide personally identifiable information to the Lifeline representative accountability database if they interact with the National Verifier database or the National Lifeline Accountability Database and/or are involved in Lifeline subscriber enrollment. They emphasized the importance of knowing as soon as possible if the Commission is considering postponing the minimum service standards implementation date.
- [Cameron Telephone \(Louisiana\)](#), [Cameron Telephone \(Texas\)](#), [Elizabeth Telephone](#) and [Santa Rosa Telephone](#) filed letters on October 22, 2019, to notify the FCC they are availing themselves of forbearance relief granted by the 2016 [order](#) from the obligation to offer Lifeline-supported broadband Internet access service. They said they are electing forbearance relief for those census blocks in their study areas that are not funded under A-CAM II, and said they do not receive high-cost support for those unfunded census blocks and are not subject to broadband public interest obligations in those blocks.
- The FCC [circulated](#) an item on October 18, 2019, entitled "modernizing the E-Rate program for schools and libraries."
- Chairman Pai sent a [letter](#) to Sen. Steve Daines (R-Mont.) on October 15, 2019, in response to his [letter](#) on broadband connectivity and expressing concern about duplicative federal USF investment leading to overbuilding of broadband infrastructure. Pai said the Commission is reviewing the record on a [petition](#) for a rulemaking to consider amending rules relating to the E-rate program competitive bidding requirements. He also said the FCC is seeking to create a Digital Opportunity Data Collection in order to generate more granular and more accurate broadband maps.
- Uniti Fiber [met with](#) Wireline Competition Bureau staff on October 22, 2019, to discuss the [petition](#) filed by the Central Texas Telephone Coop, et al. that urged the FCC to initiate a rulemaking proceeding to consider amending the E-Rate program competitive bidding requirements. Uniti Fiber asserted the petition misstates facts about the E-Rate competitive bidding process, and that the petition and the record do not include sufficient facts describing how the RFPs are harming smaller providers.
- Hewlett Packard Enterprises and Aruba, a Hewlett Packard Enterprise Company [met separately with](#) advisors to Commissioners Starks, O'Rielly, Carr and Rosenworcel on October 16, 2019, to discuss the need for schools and libraries to use E-Rate funds for network security. They urged the FCC to move quickly to ensure network security appears on the eligible services list starting with FY2020.
- The E-rate Management Professional Association [met with](#) Wireline Competition Bureau staff on September 18, 2019, to discuss the E-Rate program. E-mpa expressed the importance of a timely decision to allow applicants adequate time to forecast, plan, and procure Category Two services for Funding Year 2019. It also discussed trends in program administration, including invoice deadline issues in cases where appeals and/or waivers were granted.
- Chairman Pai sent [letters](#) to 13 members of Congress on October 15, 2019, to respond to their [letter](#) that urged the Commission to postpone adoption of the rural health care order. Pai discussed the [report and order](#) that was adopted at the FCC's August Open Meeting that reformed RHC Program rules.
- Alaska Communications Systems Holding filed a [request for review and provisional petition for waiver](#) on October 21, 2019, of a USAC decision to commit funding for only 26 days, rather than the full portion of the year for which the service that Alaska Communications provided to its customer, Sitka

Community Hospital, was eligible. It also requested, to the extent required, the Bureau waive the 60-day deadline for filing this request for review.

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Open Internet

- The Writers Guild of America West [met with](#) Commissioner Rosenworcel and her advisor on October 22, 2019, to discuss its opposition to the [repeal](#) of the 2015 open internet [order](#). WGAW also discussed its opposition to the Sprint/T-Mobile merger.

Misc.

- The FCC adopted six items at its October 25, 2019 [Open Meeting](#), including an [order on reconsideration](#) on CAF testing procedures and performance measures, arising from several petitions for reconsideration and applications for review of the [2018 Performance Measures Order](#), that provides flexibility for smaller carriers by making targeted modifications to the testing procedures carriers must use to show their networks perform at the Commission's speed and latency standards. The FCC also adopted: a [declaratory ruling](#) that clarifies section 6(f)(1) of the New and Emerging Technologies 911 Improvement Act of 2008 and ensures regulatory parity in 911 fees between VoIP services and traditional telecommunications services; a [report and order](#) that amends its tariffing rules to better align them with the reality of easy electronic access to tariff filings; an [NPRM](#) that seeks comment on whether the common antenna siting rules for FM and TV broadcaster applicants and licensees dating back to 1945 should be revised or eliminated given the current broadcasting marketplace; a [memorandum opinion and order](#) that finds Charter faces effective competition from AT&T's online video streaming service in franchise areas in Massachusetts and Hawaii; and an [order and sixth FNPRM](#) that streamlines rules and procedures to expedite the successful completion of the 800 MHz band reconfiguration initiative, lower program costs and administrative burdens, and continue to alleviate interference to public safety licensees. Some of the items are not yet released.
- The U.S. Supreme Court [declined](#) to hear the Minnesota PUC's [appeal](#) of an Eighth Circuit Court of Appeals' [decision](#) affirming a District Court of Minnesota's ruling that Charter's VoIP service is an information service under the Telecommunications Act and that state regulation of Charter's VoIP services was preempted.
- The [further notice of proposed rulemaking](#) that seeks comment on proposals to amend the FCC's schedule of regulatory fees for FY 2020 was [published](#) in the Federal Register on October 23, 2019. Comments are due November 22, 2019; reply comments are due December 23, 2019. The FCC issued a [public notice](#) on October 23, 2019, announcing the [FNPRM](#) was [published](#) in the Federal Register.
- An FCC [notice](#) was published in the Federal Register on October 25, 2019, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated with FCC Form 833, application to participate in a toll-free number auction. The FCC said applicants will use Form 833 to submit the required disclosures and certifications, and the information collected on the form will be reviewed to determine if an applicant is qualified to bid in a toll-free number auction. PRA comments are due December 24, 2019.
- An FCC [notice](#) was published in the Federal Register on October 25, 2019, seeking Paperwork Reduction Act comments on an extension of a currently approved information collection associated with numbering resource optimization- phase 3. The FCC said it uses this information to assist the state commissions in carrying out their delegated authority over numbering resources. PRA comments are due December 24, 2019.
- No comments were filed on Jive Communication's application for authorization to obtain NANP telephone numbers directly from the numbering administrators for its iVoIP service. [public notice](#)

- No comments were filed on a section 214 application filed by the estate of Jack Lee Barton, through its co-executors, and the non-exempt marital income trust U/W Jack Lee Barton and Lintel, requesting consent to transfer control of Hart Telephone and Hart Communications. Reply comments are due October 30, 2019. [public notice](#)
- The Consumer and Governmental Affairs Bureau issued three orders on October 22, 2019, addressing slamming complaints against Telplex Communications. In the first [order](#), the Bureau found Telplex changed complainants' telecommunications service providers without obtaining authorization and verification from the complainants. In the second [order](#), the Bureau found Telplex responded fully to and took action to resolve the complaint, and in the third [order](#), the Bureau found Telplex's actions did not result in an unauthorized change in complainant's telecommunications service provider.
- The Consumer and Governmental Affairs Bureau issued an [order](#) on October 23, 2019, addressing a slamming complaint against Netcom Systems Group. The Bureau found Netcom changed complainant's telecommunications service provider without obtaining authorization and verification from the complainant.

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Upcoming Filing Dates

- Oct. 29 - Comments due on Southwest Arkansas Telephone Cooperative's [request](#) that the FCC to allow it include in its rate base the interstate portion of prepaid accumulated post-retirement benefits recorded in Account 1410, Other Noncurrent Assets, beginning with the date the prepayments were made. [public notice](#)
- Oct. 29 - Comments due on WIA's petitions for [rulemaking](#) and [declaratory ruling](#) regarding section 6409(a) of the Spectrum Act of 2012, and CTIA's [petition for declaratory ruling](#) regarding section 6409 and the rules implementing section 224 of the Communications Act. Reply comments are due November 13, 2019. [public notice](#), [order](#)
- Oct. 30 - Replies due on a section 214 application filed by the estate of Jack Lee Barton, through its co-executors, and the non-exempt marital income trust U/W Jack Lee Barton and Lintel, requesting consent to transfer control of Hart Telephone and Hart Communications. [public notice](#)
- Oct. 31 - Comments due on improving the FCC form 470 drop-down menu. Form 470 is used by E-Rate program applicants use to solicit bids from service providers for E-Rate eligible services. Replies are due November 15, 2019. [public notice](#)
- Nov. 4 - Replies due on TrioTel Communications [petition](#) seeking a waiver of sections 51.917(b)(1) and 51.917(b)(7) to recalculate for merged study areas the 2011 Interstate Switched Access Revenue Requirement and 2011 RoR Carrier Base Period Revenue necessary to determine CAF-ICC support. [public notice](#)
- Nov. 6 - Comments due on the [NPRM](#) proposing procedural changes that would streamline certain FCC administrative hearings. Replies are due November 21, 2019. [FR](#)
- Nov. 13 - Replies due on WIA's petitions for [rulemaking](#) and [declaratory ruling](#) regarding section 6409(a) of the Spectrum Act of 2012, and CTIA's [petition for declaratory ruling](#) regarding section 6409 and the rules implementing section 224 of the Communications Act. [public notice](#), [order](#)
- Nov. 14 - PRA comments due on a new information collection associated with the 833 code toll-free number auction. The FCC seeks comment on the letters of authorization in order to verify the relationship between the responsible organization and the potential subscriber, and on collecting data on secondary market transactions. [notice](#)
- Nov. 15 - Replies due on improving the FCC form 470 drop-down menu. Form 470 is used by E-Rate program applicants use to solicit bids from service providers for E-Rate eligible services. [public notice](#)

- Nov. 18 - Comments due on the establishment of a computer matching program the FCC and USAC will conduct with agencies from the States of South Carolina, Virginia, and Washington to verify the eligibility of applicants to and subscribers of the Lifeline program. [notice](#)
- Nov. 21 - Replies due on the [NPRM](#) proposing procedural changes that would streamline certain FCC administrative hearings. [FR](#)
- Nov. 22 - Comments due on the [15th Broadband Deployment Report Notice of Inquiry](#) that initiates the next annual assessment of the availability of advanced telecommunications capability to all Americans in a reasonable and timely fashion. Replies are due December 9, 2019.
- Nov. 22 - Comments due on the [FNPRM](#) on proposals to amend the FCC's schedule of regulatory fees for FY 2020. Reply comments are due December 23, 2019. [FR](#)
- Dec. 5 - Comments due on the effectiveness of the FCC's [2012 tribal engagement further guidance](#), steps the FCC can take to assist parties with their engagement efforts, and refreshing the record on pending petitions for reconsideration that were filed on the tribal engagement obligation reporting. Replies are due January 6, 2020. [public notice](#)
- Dec. 9 - Replies due on the [15th Broadband Deployment Report Notice of Inquiry](#) that initiates the next annual assessment of the availability of advanced telecommunications capability to all Americans in a reasonable and timely fashion.
- Dec. 16 - PRA comments due on a revision of a currently approved information collection associated with the [urban rates survey](#). [notice](#)
- Dec. 16 - PRA comments due on an extension of a currently approved information collection associated with section 69.123, density pricing zone plans. [notice](#)
- Dec. 23 - Replies due on the [FNPRM](#) on proposals to amend the FCC's schedule of regulatory fees for FY 2020. [FR](#)
- Dec 24 - PRA comments due on an extension of a currently approved information collection associated with FCC Form 833, application to participate in a toll-free number auction. [FR](#)
- Dec. 24 - PRA comments due on an extension of a currently approved information collection associated with numbering resource optimization- phase 3. [FR](#)
- Jan. 6 - Replies due on the effectiveness of the FCC's [2012 tribal engagement further guidance](#), steps the FCC can take to assist parties with their engagement efforts, and refreshing the record on pending petitions for reconsideration that were filed on the tribal engagement obligation reporting. [public notice](#)

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